IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

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In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO et al.,

Debtors.¹

PROMESA Title III

Case No. 17 BK 3283-LTS

(Jointly Administered)

INFORMATIVE MOTION OF ASSURED GUARANTY CORP. AND ASSURED GUARANTY MUNICIPAL CORP. REGARDING MAY 21, 2018 HEARING

The Debtors in these Title III cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's Federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico ("Commonwealth") (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 04780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

To the Honorable United States Magistrate Judge Judith Gail Dein:

Assured Guaranty Corp. and Assured Guaranty Municipal Corp. (together, "<u>Assured</u>") hereby submit this informative motion in compliance with the *Notice of Hearing and Procedural Order* (ECF No. 2994),² regarding the hearing on May 21, 2018 ("<u>Hearing</u>") and respectfully states as follows:

- 1. Ellen M. Halstead of Cadwalader, Wickersham & Taft LLP will appear and present argument on behalf of Assured in Courtroom #8 of the United States District Court for the District of Massachusetts, One Courthouse Way, Boston, Massachusetts 02210.
 - 2. Ms. Halstead will address:
 - Motion to Compel Compliance with February 26, 2018 Order and For Entry of a Protective Order of Ad Hoc Group of General Obligation Bondholders, Ambac Assurance Corporation, Assured Guaranty Corp., Assured Guaranty Municipal Corp., the Mutual Fund Group, and National Public Finance Guarantee Corporation (ECF No. 2865).
 - Joinder of Assured Guaranty Corp., Assured Guaranty Municipal Corp., National Public Finance Guarantee Corporation, The Ad Hoc Group of PREPA Bondholders, Syncora Guarantee Inc., and U.S. Bank National Association, in its Capacity as PREPA Bond Trustee to Motion to Compel Compliance With February 26, 2018 Order and For Entry Of A Protective Order of Ad Hoc Group of General Obligation Bondholders, Ambac Assurance Corporation, Assured Guaranty Corp., Assured Guaranty Municipal Corp., The Mutual Fund Group, and National Public Finance Guarantee Corporation (ECF No. 2948).
 - Joint Report ordered to be filed on May 14, 2018 pursuant to the Order of the Honorable United States Magistrate Judge Judith Gail Dein entered on April 27, 2018 (ECF No. 2969).
- 3. Ms. Halstead also appears to respond to, as appropriate, any statements made by any party in connection with the above-captioned Title III cases or any adversary proceedings currently pending in the above-captioned Title III cases.

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² "<u>ECF No.</u>" refers to filings in Case No. 17 BK 3283-LTS, unless otherwise noted.

4. Ellen V. Holloman and Gillian Groarke Burns of Cadwalader,

Wickersham & Taft LLP will also attend the Hearing on behalf of Assured.

Dated: May 14, 2018

New York, New York

CASELLAS ALCOVER & BURGOS P.S.C.

/s/ Heriberto Burgos Pérez

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/s/ Ellen M. Halstead

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Counsel for Assured Guaranty Corp. and Assured Guaranty Municipal Corp.

^{*} admitted pro hac vice

CERTIFICATE OF SERVICE

I hereby certify that I filed this document electronically with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to all parties of record in the captioned case. Further, I directed that the following counsel of record be served by U.S. Mail:

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At New York, New York, 14th day of May, 2018.

By: /s/ Ellen M. Halstead*

Ellen M. Halstead

* Admitted pro hac vice